

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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<p>OTTERBOURG PC Melanie L. Cyganowski, Esq. Jennifer S. Feeney, Esq. Michael R. Maizel, Esq. mcyganowski@otterbourg.com jfeeney@otterbourg.com mmaizel@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>	<p>MASSEY & GAIL LLP Jonathan S. Massey, Esq. Rachel S. Morse, Esq. jmassey@masseygail.com rmorse@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i></p>

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**CERTIFICATION OF JONATHAN S. MASSEY, ESQ. IN SUPPORT OF APPLICATION
FOR RETENTION OF PROFESSIONAL**

I, Jonathan S. Massey, being of full age, certify as follows:

1. I am seeking authorization for my law firm Massey & Gail LLP (“Massey & Gail” or “Applicant”) to be retained as Special Counsel to the Official Committee of Talc Claimants (the “Committee”) for LTL Management, LLC (the “Debtor”) in the above-captioned case (the “Case”), effective as of April 14, 2023, the date the Committee selected Massey & Gail to serve as special counsel. I incorporate by reference here the prior certifications that I submitted in support of retention in the Debtor’s prior Chapter 11 bankruptcy (“LTL I”). [See LTL I, Dkt. 504 (application), Dkt. 504-1 (certification in support), Dkt. 764 (supplemental certification), Dkt. 1179 (second supplemental certification), Dkt. 3219 (third supplemental certification).] Those certifications remain accurate, except as expressly provided herein.

2. My professional credentials include: I am a member in good standing of the Bars of the District of Columbia (Bar #457593), the State of Maryland (Bar #0412280015), and the State of New York (Bar #2468262). I am also admitted to practice before the United States Supreme Court; all U.S. Courts of Appeals except the Eighth Circuit; and numerous U.S. District Courts. I was admitted *pro hac vice* in LTL I, first in the United States Bankruptcy Court for the Western District of North Carolina and subsequently in this Court after the case was transferred.

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

In the instant action, the Court entered an order for my admission pro hac vice on April 27, 2023. (Dkt. 342.) I am a former law clerk to Justice William J. Brennan, Jr. with significant experience with complex legal issues arising from mass tort litigation. I briefed and argued Dole Food Co. v. Patrickson, 538 U.S. 468 (2003) (mass tort), Mississippi ex rel Hood v. AU Optronics Corp., 571 U.S. 161 (2014) (mass action), Cooper Industries, Inc. v. Leatherman Tool Group, Inc., 532 U.S. 424 (2001) (punitive damages), and Chavez v. Dole Food Company, Inc., 836 F.3d 205 (3d Cir. 2016) (en banc). I drafted the briefs in Georgine v. Amchem Products, Inc., 83 F.3d 610 (3d Cir. 1996), Amchem Products, Inc. v. Windsor, 521 U.S. 591 (1997), and Ortiz v. Fibreboard Corp., 527 U.S. 815 (1999). I have participated in numerous other mass tort cases including asbestos litigation; the Flint, Michigan, lead drinking water litigation; diet drug (fen-phen) litigation in E.D. Pa. and the Third Circuit; the Sulzer hip prosthesis & knee prosthesis liability litigation (N.D. Ohio); and tobacco litigation (where I represented the States of Florida, Massachusetts, Mississippi, and Texas). I have handled other cutting-edge cases, such as helping to recover \$12.7 billion from the federal government for a group of health insurers under the Affordable Care Act, a case which I briefed and argued in the Federal Circuit and which former Solicitor General Paul Clement argued in the Supreme Court with joint briefing. Maine Community Health Options v. United States, 140 S. Ct. 1308 (2020). I have argued over 60 cases in federal and state courts and have filed briefs in many more, including more than 100 in the U.S. Supreme Court alone (most notably on behalf of Vice President Al Gore in the 2000 election litigation). In addition, I and my firm have extensive experience in bankruptcy and creditors' rights and in fraudulent transfer, successor liability, breach of fiduciary duty, and similar litigation.

3. The professional services Massey & Gail will render as special counsel to the Committee are described in the Application. The professional services Massey & Gail will render as special counsel to the Committee include, without limitation:

- a. Provide recommendations and input for legal strategies, tactics, and positions to be taken by the Committee, including those in response to motions and other actions taken by others in the bankruptcy case as well as with respect to motions filed strategies to be implemented by the Committee, whether in or out of court, as requested by the Committee;
- b. Be assigned to handle, whether the Committee is the movant or respondent, specific motions, including legal briefing, for various relief filed in the bankruptcy court, to avoid duplication with other Committee counsel, as requested by the Committee;
- c. Participate as a Committee presenter in bankruptcy hearings on specific topics for significant motions, avoiding duplication of work with other Committee counsel, as requested by the Committee;
- d. Provide strategic advice to the Committee, as requested by the Committee; and
- e. Provide such other services to the Committee as may be necessary in this Case or any related proceedings.

Massey & Gail will coordinate with the Committee's other counsel in order to maximize efficiency and avoid unnecessary duplication of effort. In light of the size of this case and scope of related litigation, the Committee determined it was in the talc claimants' best interest to retain multiple law firms. Each of the firms the Committee has proposed to retain serves a distinct purpose from the others:

- a. Brown Rudnick serves as lead bankruptcy counsel, providing a deep bench of attorneys with core bankruptcy, bankruptcy litigation and mass tort bankruptcy experience.
- b. Otterbourg serves as lead mass tort/litigation counsel and special bankruptcy counsel, providing the unique perspective of a former

bankruptcy chief judge and expertise in preliminary injunction and district court litigation.

- c. Massey & Gail serves as special counsel, providing unparalleled mass tort and other complex case experience before trial and appellate courts, including the Supreme Court.
- d. Genova Burns serves as local counsel, one of few New Jersey firms with appropriate experience that is without conflicts in this case.
- e. MoloLamken serves as the Committee's special counsel for appeals. MoloLamken is a preeminent appellate firm with substantial experience before the highest courts in the country, as well as before the Third Circuit Court of Appeals in LTL I.

Additionally, co-counsel to the Committee has instituted the following multi-step system for efficiency purposes and in order to avoid unnecessary duplication of services:

- a. First, a small group of senior partners confer to determine strategy in consultation with Committee members and their designated representatives.
- b. Next, one firm is assigned primary responsibility for a task.
- c. Once a task has been preliminarily completed, it is reviewed by the other firms, allowing the firm to whom the task is assigned to benefit from the extensive knowledge and varying perspectives of co-counsel.
- d. Once co-counsel have signed off on a particular task, it is circulated to the Committee for review and comment.

Massey & Gail believes that the above protocol is consistent with effective management of assignments in a mega bankruptcy case as well as how such matters are handled by large law firms such as those sought to be retained by the Debtor and their affiliates in other bankruptcy cases.

4. I am a member of or associated with the firm of: Massey & Gail LLP, 1000 Main Ave. SW, Suite 450, Washington, DC 20024.

5. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows:

The terms of employment of Massey & Gail agreed to by the Committee, subject to the approval of the Court, are that certain attorneys and other personnel within the firm will undertake this representation at their standard hourly rate, plus disbursements. Other members or associates of Massey & Gail may also render services to the Committee, if appropriate, at rates commensurate with the foregoing, as follows:

Partners: \$860 – \$1160

Counsel: \$800

Associates: \$485 – \$595

Paralegals: \$320

These hourly rates are subject to periodic adjustments to reflect economic and other conditions, and with respect to those below the level of senior partner, to reflect their increased experience and expertise. We will give advance notice of any such adjustments to the Official Committee, the Debtor, the United States Trustee, and the Court.

Massey & Gail has advised the Committee that it intends to seek compensation for all time and expenses associated with the preparation of this application to retain Massey & Gail and related documents, and the preparation of monthly, interim or final fee applications for Massey & Gail. Massey & Gail will bill any non-working travel time at 50% of the actual time incurred.

Massey & Gail has not agreed to share: (a) any compensation it may receive with another party or person, other than with the attorneys and staff of Massey & Gail; or (b) any compensation another person or party has received or may receive in connection with this Case. Massey & Gail has not received a retainer in connection with this Case.

☐ Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

6. To the best of my knowledge, after reasonable and diligent investigation, my

connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection:

To the best of my knowledge, except as set forth herein, the partners, counsel, associates, and staff at Massey & Gail (a) are “disinterested persons,” as that term is defined in section 101(14) of the Bankruptcy Code, and (b) do not hold or represent any adverse interest in connection with the Case within the meaning of section 1103(b) of the Bankruptcy Code.

In connection with preparing this Declaration, Massey & Gail used its customary procedures to comply with the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules regarding the retention of professionals by the Committee under the Bankruptcy Code (the “Disclosure Procedures”). Pursuant to the Disclosure Procedures, Massey & Gail conducted a disclosure review with respect to the Debtor, its equity interest holders and creditors, and other known parties in interest in the Debtor’s Case (the “Potentially Interested Parties”), which is attached hereto as **Schedule 1** (the “Potentially Interested Parties List”).

Under my direction, my staff ran the Potentially Interested Parties List against Massey & Gail’s conflicts database. The conflicts database identifies potential conflicts and/or connections when we conduct our term search using the names of the Potentially Interested Parties. I personally reviewed the results of the conflicts check.

In addition to the foregoing, an email was sent to every firm user at Massey & Gail requesting that if anyone was aware of any connection or contact, in addition to any potential conflict, with any of the Potentially Interested Parties, such user was to contact me or my partner

Rachel Morse identifying all connections and/or contacts.

Prior to being retained by the Committee in LTL I, Massey & Gail provided legal services for the benefit of the law firms of Maune Raichle Hartley French & Mudd, LLC; Levy Konigsberg LLP; Kazan, McClain, Satterley & Greenwood; and Weitz & Luxenberg P.C. (the “Mesothelioma Group”). Kristie Doyle, who is represented by Kazan, McClain, Satterley & Greenwood, was a member of the Committee in LTL I and is a member of the Committee in the instant case. Randy Derouen, who is represented by Levy Konigsberg LLP, is another. And Patricia Cook, who is represented by Weitz & Luxenberg, P.C., is a third.

After an official Committee was constituted in LTL I, Massey & Gail served as special counsel to that Committee. Massey & Gail also served as counsel to TCC II (during the time when there were two committees in LTL I), and then it resumed its role as special counsel to the TCC when the two committees were reconstituted into a single Committee. Massey & Gail separately served as special appellate counsel for the States of New Mexico and Mississippi in connection with the appeal of Adv. Proc. No. 22-01231 (MBK), as described in my third supplemental certification submitted in LTL I. [See LTL I, Dkt. 3219.]

During the time beginning with the Debtor’s filing this case, through Massey & Gail’s retention by the Committee, Massey & Gail represented an Ad Hoc Committee of Certain Talc Claimants (the “AHC”). The AHC consisted of nine members of the Original Committee—Alishia Landrum, Rebecca Love, Blue Cross Blue Shields of Massachusetts, Tonya Whetsel, Kristie Doyle, William A. Henry, Randy Derouen, April Fair and Patricia Cook—each of whom are also members appointed to the Committee in this Case. Other than its concluded representation of the AHC, Massey & Gail will not represent any entity other than the Committee in this Case.

Additionally, prior to joining Massey & Gail, one partner and two paralegals worked at

Kirkland & Ellis LLP, one associate worked at Sidley & Austin LLP, and one associate worked at Skadden on matters that do not involve or relate in any way to the Debtor or any other creditor or party in interest in this Case.

Further, Massey & Gail has been involved or is currently involved in civil actions against various Potentially Interested Parties in matters unrelated to this Case. Massey & Gail is also retained in cases, proceedings, and transactions unrelated to this Case involving professionals employed by the Debtor, claimants, and parties-in-interest in this Case, including in co-counsel relationships with Debtor's counsel. For example, Massey & Gail is co-counsel with Jones Day to Union Pacific Railroad in unrelated antitrust litigation. Massey & Gail is opposing counsel to Jones Day and King & Spalding in unrelated state court cases under the Illinois False Claims Act. It is opposing counsel to Skadden, Arps, Slate, Meager & Flom LLP in an unrelated state court class action, and it is opposing counsel to Johnson & Bell Ltd. in unrelated product liability litigation arising out of a fire incident at a commercial property in Illinois. Massey & Gail is opposing counsel to Motley Rice in unrelated litigation involving TVPA claims in the Southern District of New York.

Based on the results of the Disclosure Procedures, and except as disclosed in **Schedule 2** hereto and above, Massey & Gail has not identified any conflicts and/or connection with any of the Potentially Interested Parties.

Certain of the parties on the Potentially Interested Parties List or their attorneys may have provided, may currently provide, and may in the future provide goods or services to Massey & Gail in matters unrelated to the Bankruptcy Case. To the best of my knowledge, Massey & Gail does not have any conflicts or relationships that would impair or preclude its or my ability to serve the Committee. Massey & Gail or I may have provided, may currently provide, or may in the

future provide professional services in matters unrelated to the Bankruptcy Case to certain of the creditors of the Debtor's estate, other parties-in-interest, or attorneys involved in the Bankruptcy Case.

As a matter of its retention and disclosure policy, Massey & Gail will also periodically review its past and present relationships with entities involved or participating in the Debtor's Case, and I will file a supplemental disclosure declaration, if warranted.

As of the Court's entry of the Dismissal Order on April 4, 2023, Massey & Gail was owed \$182,502.90 for services rendered and expenses incurred in representing the Committee as its Special Counsel in LTL I (the "Pre-Petition Balance"). On April 26, 2023, the Debtor filed a motion seeking the entry of an order authorizing it to satisfy its obligations under the Dismissal Order, including the final allowance of professional fees and expenses and the payment of such allowed fees and expenses (the "Obligations Motion"). [Dkt. No. 319]. Pending entry of an order approving the Obligations Motion, Massey & Gail anticipates that the allowed amount of the Pre-Petition Balance (the "Allowed Pre-Petition Fee Claim") will be paid in connection with LTL I.

Based on the foregoing, I believe that Massey & Gail is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and it does not represent an interest adverse to the Debtor's estate.

7. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, and other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: See paragraph 6 above and Schedule 2 attached hereto.

8. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

☒ do not hold an adverse interest to the estate.

☒ do not represent an adverse interest to the estate.

☒ are disinterested under 11 U.S.C. § 101(14).

☒ do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).

☐ Other. Explain: _____

9. If the professional is an auctioneer: N/A

10. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

I certify under penalty of perjury that the above information is true.

Date: May 2, 2023

/s/ Jonathan S. Massey

Jonathan S. Massey

Schedule 1

Potentially Interested Parties

Debtor

LTL Management LLC

Direct Equity Owner of Debtor

Johnson and Johnson Consumer Inc.

Debtor's Direct Non-Debtor Subsidiary

Royalty A&M LLC

Other Non-Debtor Affiliates

3Dintegrated ApS

Acclarent, Inc.

Actelion Ltd

Actelion Manufacturing GmbH

Actelion Pharmaceuticals Australia

Pty. Limited

Actelion Pharmaceuticals Korea Ltd.

Actelion Pharmaceuticals Ltd

Actelion Pharmaceuticals Mexico

S.A. De C.V.

Actelion Pharmaceuticals Trading

(Shanghai) Co., Ltd.

Actelion Pharmaceuticals UK Limited

Actelion Pharmaceuticals US, Inc.

Actelion Registration Limited

Actelion Treasury Unlimited Company

Akros Medical, Inc.

Albany Street LLC

ALZA Corporation

Alza Land Management, Inc.

AMO (Hangzhou) Co., Ltd.

AMO (Shanghai) Medical Devices

Trading Co., Ltd.

AMO ASIA LIMITED

AMO Australia Pty Limited

AMO Canada Company

AMO Denmark ApS

AMO Development, LLC

AMO France

AMO Germany GmbH

AMO Groningen B.V.

AMO International Holdings

AMO Ireland

AMO Ireland Finance Unlimited Company

AMO Italy SRL

AMO Japan K.K.

AMO Manufacturing Spain S.L.

AMO Manufacturing USA, LLC

AMO Netherlands BV

AMO Nominee Holdings, LLC

AMO Norway AS

AMO Puerto Rico Manufacturing, Inc.

AMO Sales and Service, Inc.

AMO Singapore Pte. Ltd.

AMO Spain Holdings, LLC

AMO Switzerland GmbH

AMO U.K. Holdings, LLC

AMO United Kingdom, Ltd.

AMO Uppsala AB

AMO US Holdings, Inc.

AMO USA Sales Holdings, Inc.

AMO USA, LLC

Animas Diabetes Care, LLC

Animas LLC

Animas Technologies LLC

AorTx, Inc.

Apsis

Aragon Pharmaceuticals, Inc.

Asia Pacific Holdings, LLC

Atrionix, Inc.

AUB Holdings LLC

Auris Health, Inc.

Backsvalan 2 Aktiebolag

Backsvalan 6 Handelsbolag

Beijing Dabao Cosmetics Co., Ltd.

BeneVir BioPharm, Inc.

Berna Rhein B.V.

BioMedical Enterprises, Inc.

Biosense Webster (Israel) Ltd.

Biosense Webster, Inc.

C Consumer Products Denmark ApS

Calibra Medical LLC

Campus-Foyer Apotheke GmbH

Carlo Erba OTC S.r.l.
Centocor Biologics, LLC
Centocor Research & Development, Inc.
ChromaGenics B.V.
Ci:Labo Customer Marketing Co., Ltd.
Ci:z. Labo Co., Ltd.
Cilag AG
Cilag GmbH International
Cilag Holding AG
Cilag Holding Treasury Unlimited Company
Cilag-Biotech, S.L.
CNA Development GmbH
Codman & Shurtleff, Inc.
Coherex Medical, Inc.
ColBar LifeScience Ltd.
Company Store.com, Inc.
Cordis de Mexico, S.A. de C.V.
Cordis International Corporation
Corimmun GmbH
CoTherix Inc.
CSATS, Inc.
Darlain Trading S.A.
Debs-Vogue Corporation
(Proprietary) Limited
DePuy France
DePuy Hellas SA
DePuy International Limited
DePuy Ireland Unlimited Company
DePuy Mexico, S.A. de C.V.
DePuy Mitek, LLC
DePuy Orthopaedics, Inc.
DePuy Products, Inc.
DePuy Spine, LLC
DePuy Synthes Gorgan Limited
DePuy Synthes Institute, LLC
DePuy Synthes Leto SARL
DePuy Synthes Products, Inc.
DePuy Synthes Sales, Inc.
DePuy Synthes, Inc.
Dr. Ci:Labo Co., Ltd.
DR. CI:LABO COMPANY LIMITED
Dutch Holding LLC
ECL7, LLC
EES Holdings de Mexico,
S. de R.L. de C.V.
EES, S.A. de C.V.

EIT Emerging Implant Technologies GmbH
Ethicon Biosurgery Ireland
Ethicon Endo-Surgery (Europe) GmbH
Ethicon Endo-Surgery, Inc.
Ethicon Endo-Surgery, LLC
Ethicon Holding Sarl
Ethicon Ireland Unlimited Company
Ethicon LLC
Ethicon PR Holdings Unlimited Company
Ethicon Sarl
Ethicon US, LLC
Ethicon Women's Health & Urology Sarl
Ethicon, Inc.
Ethnor (Proprietary) Limited
Ethnor del Istmo S.A.
Ethnor Farmaceutica, S.A.
Ethnor Guatemala, Sociedad Anonima
Finsbury (Development) Limited
Finsbury (Instruments) Limited
Finsbury Medical Limited
Finsbury Orthopaedics International Limited
Finsbury Orthopaedics Limited
FMS Future Medical System SA
GH Biotech Holdings Limited
Global Investment Participation B.V.
GMED Healthcare BV
Guangzhou Bioseal Biotech Co., Ltd.
Hansen Medical Deutschland GmbH
Hansen Medical International, Inc.
Hansen Medical UK Limited
Hansen Medical, Inc.
Healthcare Services (Shanghai) Ltd.
I.D. Acquisition Corp.
Innomedic Gesellschaft für innovative
Medizintechnik und Informatik mbH
Innovalens B.V.
Innovative Surgical Solutions, LLC
J & J Company West Africa Limited
J&J Pension Trustees Limited
J.C. General Services BV
Janssen Alzheimer Immunotherapy
(Holding) Limited
Janssen Biologics (Ireland) Limited
Janssen Biologics B.V.
Janssen BioPharma, Inc.
Janssen Biotech, Inc.

Janssen Cilag Farmaceutica S.A.
Janssen Cilag S.p.A.
Janssen Cilag SPA
Janssen Cilag, C.A.
Janssen de Mexico, S. de R.L. de C.V.
Janssen Development Finance
Unlimited Company
Janssen Diagnostics, LLC
Janssen Egypt LLC
Janssen Farmaceutica Portugal Lda
Janssen Global Services, LLC
Janssen Group Holdings Limited
Janssen Holding GmbH
Janssen Inc.
Janssen Irish Finance Company UC
Janssen Korea Ltd.
Janssen Oncology, Inc.
Janssen Ortho LLC
Janssen Pharmaceutica
(Proprietary) Limited
Janssen Pharmaceutica NV
Janssen Pharmaceutica S.A.
Janssen Pharmaceutical
Janssen Pharmaceutical K.K.
Janssen Pharmaceutical Sciences
Unlimited Company
Janssen Pharmaceuticals, Inc.
Janssen Products, LP
Janssen R&D Ireland
Janssen Research & Development, LLC
Janssen Sciences Ireland
Unlimited Company
Janssen Scientific Affairs, LLC
Janssen Supply Group, LLC
Janssen Vaccines & Prevention B.V.
Janssen Vaccines Corp.
Janssen-Cilag
Janssen-Cilag (New Zealand) Limited
Janssen-Cilag A/S
Janssen-Cilag AG
Janssen-Cilag Aktiebolag
Janssen-Cilag AS
Janssen-Cilag B.V.
Janssen-Cilag de Mexico S. de R.L. de C.V.
Janssen-Cilag Farmaceutica Lda.
Janssen-Cilag Farmaceutica Ltda.

Janssen-Cilag GmbH
Janssen-Cilag International NV
Janssen-Cilag Kft.
Janssen-Cilag Limited
Janssen-Cilag Limited
Janssen-Cilag Manufacturing, LLC
Janssen-Cilag NV
Janssen-Cilag OY
Janssen-Cilag Pharma GmbH
Janssen-Cilag Pharmaceutical S.A.C.I.
Janssen-Cilag Polska, Sp. z o.o.
Janssen-Cilag Pty Ltd
Janssen-Cilag S.A.
Janssen-Cilag s.r.o.
Janssen-Cilag, S.A.
Janssen-Cilag, S.A. de C.V.
Janssen-Pharma, S.L.
J-C Health Care Ltd.
Jevco Holding, Inc.
JJ Surgical Vision Spain, S.L.
JJC Acquisition Company B.V.
JJHC, LLC
JJSV Belgium BV
JJSV Manufacturing Malaysia SDN. BHD.
JJSV Norden AB
JJSV Produtos Otricos Ltda.
JNJ Global Business Services s.r.o.
JNJ Holding EMEA B.V.
JNJ International Investment LLC
JNJ Irish Investments ULC
Johnson & Johnson
Johnson & Johnson - Societa' Per Azioni
Johnson & Johnson (Angola), Limitada
Johnson & Johnson (China) Investment Ltd.
Johnson & Johnson (Egypt) S.A.E.
Johnson & Johnson (Hong Kong) Limited
Johnson & Johnson (Ireland) Limited
Johnson & Johnson (Jamaica) Limited
Johnson & Johnson (Kenya) Limited
Johnson & Johnson (Middle East) Inc.
Johnson & Johnson (Mozambique),
Limitada
Johnson & Johnson (Namibia)
(Proprietary) Limited
Johnson & Johnson (New Zealand) Limited
Johnson & Johnson (Philippines), Inc.

Johnson & Johnson (Private) Limited
Johnson & Johnson (Thailand) Ltd.
Johnson & Johnson (Trinidad) Limited
Johnson & Johnson (Vietnam) Co., Ltd
Johnson & Johnson AB
Johnson & Johnson AG
Johnson & Johnson Belgium
Finance Company BV
Johnson & Johnson Bulgaria EOOD
Johnson & Johnson China Ltd.
Johnson & Johnson Consumer
(Hong Kong) Limited
Johnson & Johnson Consumer
(Thailand) Limited
Johnson & Johnson Consumer B.V.
Johnson & Johnson Consumer
Holdings France
Johnson & Johnson Consumer Inc.
Johnson & Johnson Consumer NV
Johnson & Johnson Consumer
Saudi Arabia Limited
Johnson & Johnson Consumer Services
EAME Ltd.
Johnson & Johnson d.o.o.
Johnson & Johnson de Argentina
S.A.C. e. I.
Johnson & Johnson de Chile Limitada
Johnson & Johnson de Chile S.A.
Johnson & Johnson de Colombia S.A.
Johnson & Johnson de Costa Rica, S.A.
Johnson & Johnson de Mexico, S.A. de C.V.
Johnson & Johnson de Uruguay S.A.
Johnson & Johnson de Venezuela, S.A.
Johnson & Johnson del Ecuador, S.A.
Johnson & Johnson Del Paraguay, S.A.
Johnson & Johnson del Peru S.A.
Johnson & Johnson do Brasil Industria E
Comercio de Produtos Para Saude Ltda.
Johnson & Johnson Dominicana, S.A.S.
Johnson & Johnson Enterprise
Innovation Inc.
Johnson & Johnson European
Treasury Company
Johnson & Johnson Finance Corporation
Johnson & Johnson Finance Limited

Johnson & Johnson Financial
Services GmbH
Johnson & Johnson for Export and
Import LLC
Johnson & Johnson Foundation Scotland
(NON-PROFIT)
Johnson & Johnson Gateway, LLC
Johnson & Johnson Gesellschaft m.b.H.
Johnson & Johnson GmbH
Johnson & Johnson Guatemala, S.A.
Johnson & Johnson Health and
Wellness Solutions, Inc.
Johnson & Johnson Health Care
Systems Inc.
Johnson & Johnson Hellas Commercial and
Industrial S.A.
Johnson & Johnson Hellas Consumer
Products Commercial Societe Anonyme
Johnson & Johnson Hemisferica S.A.
Johnson & Johnson Holding GmbH
Johnson & Johnson Holdings K.K.
Johnson & Johnson Inc.
Johnson & Johnson Industrial Ltda.
Johnson & Johnson Innovation - JJDC, Inc.
Johnson & Johnson Innovation Limited
Johnson & Johnson Innovation LLC
Johnson & Johnson International
Johnson & Johnson International
(Singapore) Pte. Ltd.
Johnson & Johnson International Financial
Services Company
Johnson & Johnson Japan Inc.
Johnson & Johnson K.K.
Johnson & Johnson Kft.
Johnson & Johnson Korea Ltd.
Johnson & Johnson Korea Selling &
Distribution LLC
Johnson & Johnson Limitada
Johnson & Johnson Limited
Johnson & Johnson LLC
Johnson & Johnson Luxembourg Finance
Company Sarl
Johnson & Johnson Management Limited
Johnson & Johnson Medical (China) Ltd.
Johnson & Johnson Medical
(Proprietary) Ltd

Johnson & Johnson Medical (Shanghai) Ltd.
Johnson & Johnson Medical (Suzhou) Ltd.
Johnson & Johnson Medical B.V.
Johnson & Johnson Medical Devices &
Diagnostics Group - Latin America,
L.L.C.
Johnson & Johnson Medical GmbH
Johnson & Johnson Medical Korea Ltd.
Johnson & Johnson Medical Limited
Johnson & Johnson Medical Mexico, S.A.
de C.V.
Johnson & Johnson Medical NV
Johnson & Johnson Medical
Products GmbH
Johnson & Johnson Medical Pty Ltd
Johnson & Johnson Medical S.A.
Johnson & Johnson Medical S.p.A.
Johnson & Johnson Medical SAS
Johnson & Johnson Medical
Saudi Arabia Limited
Johnson & Johnson Medical Servicios
Profesionales S. de R.L. de C.V.
Johnson & Johnson Medical Taiwan Ltd.
Johnson & Johnson Medical, S.C.S.
Johnson & Johnson Medikal Sanayi ve
Ticaret Limited Sirketi
Johnson & Johnson Middle East FZ-LLC
Johnson & Johnson Morocco
Societe Anonyme
Johnson & Johnson Nordic AB
Johnson & Johnson Pacific Pty Limited
Johnson & Johnson Pakistan
(Private) Limited
Johnson & Johnson Panama, S.A.
Johnson & Johnson Personal Care
(Chile) S.A.
Johnson & Johnson Poland Sp. z o.o.
Johnson & Johnson Private Limited
Johnson & Johnson Pte. Ltd.
Johnson & Johnson Pty. Limited
Johnson & Johnson Research Pty Ltd
Johnson & Johnson Romania S.R.L.
Johnson & Johnson S.E. d.o.o.
Johnson & Johnson S.E., Inc.
Johnson & Johnson Sante Beaute France
Johnson & Johnson SDN. BHD.

Johnson & Johnson Services, Inc.
Johnson & Johnson Servicios Corporativos,
S. de R.L. de C.V.
Johnson & Johnson Surgical Vision India
Private Limited
Johnson & Johnson Surgical Vision, Inc.
Johnson & Johnson Taiwan Ltd.
Johnson & Johnson UK Treasury
Company Limited
Johnson & Johnson Ukraine LLC
Johnson & Johnson Urban Renewal
Associates
Johnson & Johnson Vision Care
(Shanghai) Ltd.
Johnson & Johnson Vision Care Ireland
Unlimited Company
Johnson & Johnson Vision Care, Inc.
Johnson & Johnson, S.A.
Johnson & Johnson, S.A. de C.V.
Johnson & Johnson, s.r.o.
Johnson & Johnson, s.r.o.
Johnson and Johnson (Proprietary) Limited
Johnson and Johnson Sihhi Malzeme Sanayi
Ve Ticaret Limited Sirketi
JOM Pharmaceutical Services, Inc.
La Concha Land Investment Corporation
Latam International Investment Company
Unlimited Company
Lifescan
McNeil AB
McNeil Consumer Pharmaceuticals Co.
McNeil Denmark ApS
McNeil Healthcare (Ireland) Limited
McNeil Healthcare (UK) Limited
McNeil Healthcare LLC
McNeil Iberica S.L.U.
McNeil LA LLC
McNEIL MMP, LLC
McNeil Nutritionals, LLC
McNeil Panama, LLC
McNeil Products Limited
McNeil Sweden AB
MDS Co. Ltd.
Medical Device Business Services, Inc.
Medical Devices & Diagnostics Global
Services, LLC

Medical Devices International LLC
Medical Industrial do Brasil Ltda.
Medos International Sarl
Medos Sarl
MegaDyne Medical Products, Inc.
Menlo Care De Mexico, S.A. de C.V.
Mentor B.V.
Mentor Deutschland GmbH
Mentor Medical Systems B.V.
Mentor Partnership Holding
Company I, LLC
Mentor Texas GP LLC
Mentor Texas L.P.
Mentor Worldwide LLC
Micrus Endovascular LLC
Middlesex Assurance Company Limited
Momenta Ireland Limited
Momenta Pharmaceuticals, Inc.
NeoStrata Company, Inc.
NeoStrata UG (haftungsbeschränkt)
Netherlands Holding Company
Neuravi Inc.
Neuravi Limited
NeuWave Medical, Inc.
Novira Therapeutics, LLC
NuVera Medical, Inc.
Obtech Medical Mexico, S.A. de C.V.
OBTECH Medical Sarl
OGX Beauty AU Pty Ltd
OGX Beauty Limited
OMJ Holding GmbH
OMJ Ireland Unlimited Company
OMJ Pharmaceuticals, Inc.
Omrix Biopharmaceuticals Ltd.
Omrix Biopharmaceuticals NV
Omrix Biopharmaceuticals, Inc.
Ortho Biologics LLC
Ortho Biotech Holding LLC
Ortho-McNeil Pharmaceutical, LLC
Orthotaxy
Patriot Pharmaceuticals, LLC
Peninsula Pharmaceuticals, LLC
Penta Pty. Limited
Percivia LLC
Perouse Plastie
Pharmadirect Ltd.

Pharmedica Laboratories (Proprietary)
Limited
PMC Holdings G.K.
Princeton Laboratories, Inc.
Productos de Cuidado Personal y de La
Salud de Bolivia S.R.L.
Proleader S.A.
PT Integrated Healthcare Indonesia
PT. Johnson & Johnson Indonesia
Pulsar Vascular, Inc.
Regency Urban Renewal Associates
RespiVert Ltd.
RoC International
Rutan Realty LLC
Scios LLC
Sedona Enterprise Co., Ltd.
Sedona Singapore International Pte. Ltd.
Sedona Thai International Co., Ltd.
Serhum S.A. de C.V.
Shanghai Elsker For Mother & Baby
Co., Ltd
Shanghai Johnson & Johnson Ltd.
Shanghai Johnson & Johnson
Pharmaceuticals Ltd.
Sightbox, LLC
Sodiac ESV
Spectrum Vision Limited Liability Company
Spectrum Vision Limited Liability Company
Spectrum Vision Limited Liability
Partnership
Spine Solutions GmbH
SterilMed, Inc.
Sterilmed, Inc.
Surgical Process Institute Deutschland
GmbH
Synthes Costa Rica S.C.R., Limitada
SYNTHES GmbH
Synthes GmbH
Synthes Holding AG
Synthes Holding Limited
SYNTHES Medical Immobilien GmbH
Synthes Medical Surgical Equipment &
Instruments Trading LLC
Synthes Produktions GmbH
Synthes Proprietary Limited
Synthes S.M.P., S. de R.L. de C.V.

Synthes Tuttlingen GmbH
Synthes USA Products, LLC
Synthes USA, LLC
Synthes, Inc.
TARIS Biomedical LLC
TearScience, Inc.
The Anspach Effort, LLC
The Vision Care Institute, LLC
Tibotec, LLC
Torax Medical, Inc.
TriStrata, Incorporated
UAB “Johnson & Johnson”
Vania Expansion
Verb Surgical Inc.
Vision Care Finance Unlimited Company
Vogue International LLC
Vogue International Trading, Inc.
WH4110 Development Company, L.L.C.
Xian Janssen Pharmaceutical Ltd.
XOI Limited
Zarbee's, Inc.

Managers and Officers of the Debtor

John Kim
Richard Dickinson
Robert Wuesthoff
Russell Deyo

Major Current Business Affiliations of Debtor's Managers

American Foundation for Opioid
Alternatives
Lawyers for Civil Justice
Migration Policy Institute
Miller Center for Community Protection &
Reliance, Eagleton Institute of Politics,
Rutgers University
National Center for State Courts
National Council, McLean Hospital
New Jersey Civil Justice Institute
One Mind

Depository and Disbursement Banks

Bank of America, N.A.

Major Sureties

Chubb
Federal Insurance Company
Liberty Mutual Insurance Company
Travelers Casualty and Surety Company of
America

Parties to Material Contracts with the Debtor

Johnson & Johnson
Johnson & Johnson Consumer Inc.
Johnson & Johnson Services, Inc.
U.S. Bank N.A.

Significant Co-Defendants in Talc-Related Litigation

3M Company
A.O. Smith Corporation
Albertsons Companies, Inc.
Avon Products, Inc.
Barretts Minerals, Inc.
BASF Catalysts LLC
Block Drug Company, Inc.
Borg Warner Morse Tec, Inc.
Brenntag North America
Brenntag Specialties, Inc.
Bristol-Myers Squibb Company
Carrier Corporation
Chanel, Inc.
Charles B. Chrystal Co., Inc.
Chattem, Inc.
Colgate-Palmolive Company
Conopco Inc.
Costco Wholesale Corporation
Coty, Inc.
Crane Co.
CVS Health Corporation
CVS Pharmacy, Inc.
Cyprus Amax Minerals Company
Cyprus Mines Corporation
Dana Companies, LLC
DAP Products, Inc.
Dollar General Corporation

Duane Reade Inc.
Eaton Corporation
Eli Lilly and Company
Elizabeth Arden, Inc.
Estee Lauder Inc.
Family Dollar Stores Inc.
Flowserve US, Inc.
FMC Corporation
Food 4 Less of California, Inc.
Ford Motor Company
Foster Wheeler, LLC
Gardner Denver, Inc.
General Electric Company
Genuine Parts Company
Goodyear Tire & Rubber Co.
Goulds Pumps, LLC
Grinnell LLC
Honeywell International, Inc.
Imerys Talc America, Inc.
Imerys USA, Inc.
IMO Industries Inc.
John Crane, Inc.
K&B Louisiana Corporation
Kaiser Gypsum Company, Inc.
Kmart Corporation
Kolmar Laboratories
Longs Drug Stores California
L'Oreal USA, Inc.
Lucky Stores, Inc.
Macy's, Inc.
Mary Kay Inc.
Maybelline LLC
Metropolitan Life Insurance Company
Noxell Corporation
Personal Care Products Council
Pfizer, Inc.
Pharma Tech Industries, Inc.
Pneumo Abex, LLC
PTI Royston, LLC
Publix Super Markets, Inc.
R.T. Vanderbilt Holding Company, Inc.
Ralphs Grocery Company
Revlon Consumer Products Corporation
Revlon, Inc.
Rite Aid Corporation

Safeway, Inc.
Sanofi-Aventis U.S. LLC
Shulton, Inc.
Specialty Minerals Inc.
Target Corporation
The Dow Chemical Company
The Estee Lauder Companies, Inc.
The Kroger Co.
The Procter & Gamble Company
Thrifty Payless, Inc.
Unilever Home & Personal Care USA
Union Carbide Corporation
Vanderbilt Minerals, LLC
ViacomCBS, Inc.
Walgreen Co.
Walmart, Inc.
Warren Pumps, LLC
Whittaker Clark & Daniels, Inc.
Wyeth Holdings LLC
Yves Saint Laurent America, Inc.

**Debtors' Retained Professionals and
Claims Agent**

AlixPartners LLP
Bates White LLC
Epiq Corporate Restructuring LLC
Jones Day
King & Spalding LLP
McCarter & English, LLP
Rayburn Cooper & Durham, P.A.
Shook, Hardy & Bacon L.L.P.
Weil Gotshal & Manges LLP

**Debtors' Significant Ordinary Course
Professionals, Consultants, and Service
Providers**

Adler Pollock & Sheehan PC
Bailey Glasser LLP
Barnes & Thornburg, LLP
Barrasso Usdin Kupperman
Freeman & Sarver, L.L.C.
Blake, Cassels & Graydon LLP
Blank Rome LLP
Brown Greer PLC
Butler Snow LLP
Carlton Fields, P.A.

Chehardy, Sherman, Williams,
Recile, & Hayes
Covington & Burling LLP
Damon Key Leong Kupchak Hastert
Davis Hatley Haffeman & Tighe
Dechert LLP
Elliott Law Offices, PA
Faegre Drinker Biddle & Reath LLP
Folliott, Huff, Ottaway & Bottom
Gibson, Dunn & Crutcher LLP
Goldman Ismail Tomaselli Brennan &
Baum
Hartline Barger
HeplerBroom LLC
Irwin Fritchie Urquhart & Moore LLC
Johnson & Bell Ltd.
Jones, Skelton & Hochuli, P.L.C.
Kaplan, Johnson, Abate & Bird LLP
Kelley Jasons McGowan Spinelli
Hanna & Reber, LLP
Kirkland & Ellis LLP
Kitch Drutchas Wagner
Valitutti & Sherbrook
Lewis Brisbois Bisgaard & Smith, LLP
Manion Gaynor & Manning LLP
Miles & Stockbridge
Milligan & Herns
Morgan Lewis
Nelson Mullins Riley & Scarborough, LLP
Nutter McClennen & Fish LLP
Orrick, Herrington, & Sutcliffe, LLP
Patterson Belknap Webb & Tyler LLP
Proskauer Rose LLP
Quattlebaum, Grooms & Tull PLLC
Schnader Harrison Segal & Lewis
Schwabe Williamson & Wyatt
Sidley Austin LLP
Skadden, Arps, Slate, Meager & Flom LLP
Stoel Rives LLP
Sullivan Whitehead & Deluca LLP
Swartz Campbell LLC
The Weinhardt Law Firm
Tucker Ellis LLP
Willcox & Savage, P.C.

**Known Professionals for Certain
Non-Debtor Parties in Interest**

Cravath, Swaine & Moore
White & Case LLP

Material Potentially Indemnified Parties

Bausch Health Companies Inc.
Cyprus Mines Corporation
Cyprus Talc Corp.
Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
Luzenac America, Inc.
Pharma Tech Industries, Inc.
PTI Royston, LLC
Rio Tinto America, Inc.
RTZ America, Inc.
Valeant Pharmaceuticals International, Inc.
Windsor Minerals Inc.
Costco Wholesale Corporation
Publix Super Markets, Inc.
Rite Aid Corporation
Safeway Inc.
Walmart Inc.

**Law Firms with Significant
Representations of Talc Claimants**

Arnold & Itkin LLP
Ashcraft & Gerel, LLP
Aylstock, Witkin, Kreis & Overholtz, PLLC
Barnes Firm
Beasley Allen Law Firm
Cellino Law LLP
Dalimonte Rueb Stoller, LLP
Dean Omar Branham Shirley, LLP
Driscoll Firm, LLC
Fears Nachawati Law Firm
Ferraro Law Firm
Flint Law Firm LLC
Golomb Spirit Grunfeld, P.C.
Honik LLC
Johnson Law Group
Karst & von Oiste LLP
Kazan, McClain, Satterley
& Greenwood PLC

Lanier Law Firm
Levy Konigsberg LLP
Maune Raichle Hartley French &
Mudd, LLC
Miller Firm, LLC
Motley Rice LLC
Napoli Shkolnik PLLC
OnderLaw, LLC
Simmons Hanly Conroy LLC
Simon Greenstone Panatiere
Bartlett, PC
The Gori Law Firm
Trammell PC
Weitz & Luxenberg, P.C.
Williams Hart Law Firm

**Key Parties in Imerys Talc America, Inc.
and Cyprus Mines Corp. Chapter 11 Cases**

Cyprus Amax Minerals Company
Cyprus Mines Corporation
Cyprus Talc Corporation
Imerys S.A.
Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
(fka Windsor Minerals Inc.)
James L. Patton
Luzenac America, Inc.
Official Committee of Tort Claimants
(In re Imerys Talc America, Inc.)
Official Committee of Tort Claimants
(In re Cyprus Mines Corp.)
Roger Frankel

Debtor's Insurers

A.G. Securitas
ACE Property & Casualty Insurance
Company
Aetna Casualty and Surety Company
Affiliated FM Ins. Company
AIG Europe S.A.
AIG Property and Casualty Company
AIU Ins. Company
Allianz Ins. Company

Allianz Global Risks US Insurance
Company
Allstate Insurance Company
American Centennial Ins. Company
American Motorists Ins. Company
American Re-Insurance Company
Arrowood Indemnity Company
ASR Schadeverzekering N.V.
Assurances Generales De France
Assurantiekantoor VanWijk & Co.
Atlanta International Insurance Company
Birmingham Fire Ins. Company of
Pennsylvania
Central National Ins. Company of Omaha
Century Indemnity Company
Champion Dyeing Allocation Year
Chubb
City Ins. Company
Colonia Versicherungs AG, Koln
Continental Insurance Company
Darag Deutsche Versicherungs-Und
Rückversicherungs-AG
Drake Ins. Company of New York
Employers Ins. Company of Wausau
Employers Ins. of Wausau
Employers Mutual Casualty Company
Eurinco Allgemeine
Versicherungs AG, Dusseldorf
Everest Reinsurance Company
Fireman's Fund Ins. Company
First State Ins. Company
GAP
Gibraltar Casualty Company
Granite State Ins. Company
Great American
Great Northern Ins. Company
Great Southwest Fire Ins. Company
Groupe Drouot
Harbor Ins. Company
Hartford Accident and Indemnity Company
Home Ins. Company
Ideal Mutual Ins. Company
Industrial Indemnity Company
Ins. Company of North America
Ins. Company of the State of Pennsylvania
Ins. Corporation of Singapore Limited

Integrity Ins. Company
International Ins. Company
International Surplus Lines Ins. Company
Lexington Ins. Company
London Guarantee and Accident
Company of N.Y.
L'Union Atlantique S.A. d'Assurances
Mead Reinsurance Corporation
Middlesex Assurance Company
Midland Ins. Company
Midstates Reinsurance Corp.
Mission Ins. Company
Mission National Ins. Company
Munich Reinsurance America, Inc.
Mutual Fire, Marine, & Inland Ins.
Company
N.V. De Ark
N.V. Rotterdamse Assurantiemas
N.V. Schadeverzekeringsmaatschappij
Maas Lloyd
National Casualty Company
National Union Fire Ins. Company of
Pittsburgh, PA
Nationwide
New Hampshire Ins. Company
North River Ins. Company
Northbrook Excess and Surplus
Ins. Company
Northeastern Fire Ins. Company
of Pennsylvania
Pacific Employers Ins. Company
ProSight
Prudential Reinsurance Company
Puritan Insurance Company
Republic Indemnity Company of America
Republic Ins. Company
Republic Western Ins. Company
Repwest Insurance Company
Resolute Management Inc.
Rheinland Versicherungen
Rheinland Verzekeringen
Riverstone Insurers
Royal Belge I.R., S.A. d'Assurances
Royal Indemnity Company
Royal Ins. Company
Safety Mutual Casualty Corporation

Safety National Casualty Corporation
Seguros La Republica SA
Sentry Insurance A Mutual Company
Southern American Ins. Company
Starr Indemnity & Liability Company
TIG Insurance Company
Transamerica Premier Insurance Company
Transit Casualty Company
Travelers Casualty and Surety Company
UAP
Union Atlantique d'Assurances S.A.
Union Indemnity Ins. Company
of New York
Westchester Fire Insurance Company
Westport Insurance Corporation
XL Ins. Company

**Employees of the Bankruptcy
Administrator's Office for the Western
District of North Carolina**

Alexandria Kenny
Anne Whitley
David Shepherd
Katrina Adams
Sarah Scholz
Shelley K. Abel

**Bankruptcy Judges for the Western
District of North Carolina**

Judge George Hodges
Judge J. Craig Whitley
Judge Laura T. Beyer

Committee Members

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Washington, DC 20006

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Spring, TX 77389

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c/o Levin Papantonio Rafferty
Attn: Christopher Tisi
316 S Baylen Street, Suite 600
Pensacola, FL 32502

Sue Sommer-Kresse
c/o Motley Rice
Attn: Daniel Lapinski, Esq.
210 Lake Drive East, Suite 101
Cherry Hill, NJ 08002

Brandi Carl
c/o Golomb Spirt Grunfeld
Attn: Richard Golomb, Esq.
1835 Market Street, Suite 2900
Philadelphia, PA 19103

Patricia Cook
c/o Weitz & Luxenberg, P.C.
Attn: Danny Kraft
700 Broadway
New York, NY 10083

Alishia Landrum
c/o Beasley Allen Law Firm
Attn: Leigh O'Dell
PO Box 4160
Montgomery, AL 36103

Blue Cross Blue Shield of Massachusetts
c/o Hill Hill Carter Franco Cole & Black,
PC
Attn: Elizabeth Carter
425 Perry Street
Montgomery, AL 36104

Kristie Doyle
c/o Kazan, McClain, Satterley &
Greenwood PLC
Attn: Steven Kazan
55 Harrison St., Ste. 400
Oakland, CA 94607

Randy Derouen
c/o Levy Konigsberg LLP
Attn: Audrey Raphael
605 Third Avenue, 33rd Fl
New York, NY 10158

April Fair
c/o Robinson Calcagnie, Inc.
Attn: Mark Robinson, Jr.
19 Corporate Plaza Drive
Newport Beach, CA 92660

Additional Parties

Cohen, Placitella & Roth
Warren T. Burns
Burns Charest LLP
Richard H. Meadow
Richard Golomb
Golomb & Honik, PC
Hunter J. Shkolnik
Laurence S. Berman
Levin, Sedran & Berman LLP
Timothy G. Blood
Blood, Hurst & O'Reardon, LLP
Sindu S. Daniel
Grant & Eisenhofer
Jeff S. Gibson
Wagner Reese, LLP
Kristie M. Hightower
Lundy, Lundy, Soileau & South, LLP
Daniel R. Lapinski
Victoria Maniatis
Sanders Phillips Grossman, LLC
Carmen S. Scott
Eric H. Weinberg
The Weinberg Law Firm
Richard L. Root
Morris Bart, LLC
Christopher V. Tisi
Advanced Sterilization Products
Aveeno
J.C. Services CVBA
Neutrogena
Surg Rx
Veridex
Childers, Schlueter & Smith
Ferrer, Poirot & Wansbrough
McDonald Worley
Pulaski Kherkher PLLC
Rueb Stoller Daniel, LLP
Nachawati Law Group
Wagstaff Law Firm
Watts Guerra LLP
FTI Consulting, Inc.
Brown Rudnick LLP
Otterbourg PC
MoloLamken LLP

Walsh Pizzi O'Reilly Falanga LLP
Genova Burns LLP
Houlihan Lokey Capital, Inc.
Miller Thomson LLP
Massey & Gail LLP
CRA International, Inc.
Anderson Kill P.C.
Berkeley Research Group LLC
Bernstein Shur Sawyer & Nelson
Lighthouse Technologies, Inc.
Cassels Brock and Blackwell LLP
Albert Schwenk
Bailey Cowan Heckaman

**Judges for the United States Bankruptcy
Court for the District of New Jersey**

Hon. Michael B. Kaplan
Hon. Rosemary Gambardella
Hon. Kathryn C. Ferguson
Hon. Christine M. Gravelle
Hon. Andrew B. Altenburg, Jr.
Hon. Vincent F. Papalia
Hon. John K. Sherwood
Hon. Jerrold N. Poslusny, Jr.
Hon. Stacey L. Meisel

**United States Trustee for Region 3 and
Employees (New Jersey Office)**

Andrew R. Vara
Martha Hildebrandt
Adela Alfaro
Kirsten K. Ardelean
Francyne D. Arendas
Michael Artis
Lauren Bielskie
Peter J. D'Auria
Neidy Fuentes
David Gerardi
Rosemarie Giles
Tia Green
Mitchell B. Hausman
Joseph C. Kern
Daniel C. Kropiewnicki
Maggie McGee
Alexandria Nikolinos
Tina L. Oppelt
Angeliza Ortiz-Ng
Robert J. Schneider, Jr.
Jeffrey Sponder
Fran B. Steele
James Stives
William J. Ziemer

**Parties Who Have Entered Into Plan
Support Agreements**

Andres Pereira Firm
Ferrer, Poirot & Wansbrough
Johnson Law Group
Liakos Law, APC
Linville Law Group
McDonald Worley
Nachawati Law Group
OnderLaw, LLC
Pulaski Kherkher PLLC
Rueb Stoller Daniel, LLP
Seeger Weiss LLP
Slater Slater Schulman LLP
Trammell PC
Watts Guerra LLP
Wisner Baum, LLP

Schedule 2

Party	Type	Connection
Janssen Ortho LLC Ortho-McNeil Pharmaceutical, LLC	Other Non-Debtor Affiliates	M&G represented amicus curiae former FDA Commissioner Dr. Donald Kennedy in unrelated litigation in Ortho-McNeil-Janssen Pharmaceuticals, Inc. v. State, 2014 Ark. 124 (2014)
U.S. Bank, N.A.	Parties to Material Contracts with the Debtor	M&G represented JPMorgan Chase in unrelated 2016 litigation involving U.S. Bank, N.A., in a matter that is now closed. An M&G paralegal was previously employed by U.S. Bank more than a decade ago and did not work on any related matters.
Bank of America, N.A.	Depository and Disbursement Bank	Some of the attorneys and paraprofessionals at M&G have personal bank accounts with Bank of America, N.A. In addition, M&G represented the plaintiff in unrelated litigation in Underwood v. Bank of America Corp., 996 F.3d 1038 (CA10 2021)
3M	Significant Co- Defendants in Talc- Related Litigation	An M&G paralegal worked on unrelated 3M matters at her previous employer
BASF Catalysts LLC	Significant Co- Defendants in Talc- Related Litigation	M&G represents Union Pacific Railroad in unrelated antitrust litigation brought by BASF
Bristol-Myers Squibb Company	Significant Co- Defendants in Talc- Related Litigation	An M&G partner previously represented a party in unrelated patent litigation against Bristol-Myers Squibb Company in LEK D.D v. Bristol-Myers Squibb Company, et al. No. 2:06-cv-00547 (E.D. Tex.)
Carrier	Significant Co- Defendants in Talc- Related Litigation	An M&G paralegal worked on unrelated Carrier matters at her previous employer
Costco	Significant Co- Defendants in Talc- Related Litigation	Some of the attorneys and paraprofessionals at M&G have personal memberships at Costco
CVS Health Corporation CVS Pharmacy, Inc.	Significant Co- Defendants in Talc- Related Litigation	M&G represented The Chickasaw Nation in unrelated litigation against Caremark, LLC, Caremark PHC, LLC, CaremarkPCS Health, LLC, Caremark RX, LLC, Aetna, Inc., and Aetna Health, Inc., which are all wholly owned indirect subsidiaries of CVS Health Corporation, in No. 21-16209 (CA9)
FMC	Significant Co- Defendants in Talc-	An M&G paralegal worked on unrelated FMC matters at her previous employer

	Related Litigation	
Ford Motor Co.	Significant Co-Defendants in Talc-Related Litigation	M&G represents Union Pacific Railroad in unrelated antitrust litigation brought by Ford Motor Co. An M&G partner previously represented a party in unrelated antitrust litigation against Ford Motor Co. in ChoiceParts, LLC v. GM Corp., et al., No. 01 C 67 (N.D. Ill.).
General Electric Co.	Significant Co-Defendants in Talc-Related Litigation	M&G represents Union Pacific Railroad in unrelated antitrust litigation brought by General Electric Co. In addition, M&G represented General Electric Co. in unrelated litigation in General Electric Co. v. Jackson, No. 11-871, cert. denied, 563 U.S. 1032 (2011), and as an amicus curiae in Sackett v. EPA, 566 U.S. 120 (2012), and Burlington Northern and Santa Fe Railroad v. United States, 556 U.S. 599 (2009)
Great American	Debtor's Insurer	One of M&G's partners represented an insured in unrelated insurance coverage litigation in Paradise Housing Partners, LP, et. al. v. Great Am. Assurance Co., et. al., No. 21-2-00298-2-SEA (Superior Court, King County, Wash.)
Honeywell	Significant Co-Defendants in Talc-Related Litigation	M&G formerly represented Honeywell in unrelated litigation in Honeywell International, Inc. v. BRK Brands, Case No. 1:15-cv-08493 (N.D. Ill.), an M&G paralegal worked on unrelated Honeywell matters at her previous employer, and M&G associates worked on unrelated Honeywell matters at their previous employers.
L'Oreal USA, Inc.	Significant Co-Defendants in Talc-Related Litigation	A M&G partner formerly represented parties in unrelated litigation against L'Oreal in Salon FAD v. L'Oreal USA, Inc., et al., No. 10-CV-5063 (S.D.N.Y.).
Pfizer, Inc.	Significant Co-Defendants in Talc-Related Litigation	M&G represented class plaintiffs in unrelated litigation in In re Pfizer Inc. Securities Litigation, 819 F.3d 642 (CA2 2016)
Proctor & Gamble	Significant Co-Defendants in Talc-Related Litigation	M&G represents Union Pacific Railroad in unrelated antitrust litigation brought by Proctor & Gamble
The Dow Chemical Company	Significant Co-Defendants in Talc-Related Litigation	M&G represents Union Pacific Railroad in unrelated antitrust litigation brought by The Dow Chemical Company. An M&G paralegal worked on unrelated Dow

		<p>matters at her previous employer.</p> <p>In addition, M&G has represented products liability plaintiffs in unrelated litigation in <i>Dole Food Co. v. Patrickson</i>, 538 U.S. 468 (2003), <i>Chavez v. Dole Food Company, Inc.</i>, 836 F.3d 205 (CA3 2016) (en banc), <i>Patrickson v. Dole Food Company</i>, 251 F.3d 795 (CA9 2001), <i>Dow Chemical Corp. v. Blanco</i>, 67 A.3d 392 (Del. 2013), <i>Blanco v. AMVAC Chemical Corp.</i>, 2012 WL 3194412 (Del. Super. Aug. 8, 2012), <i>Chaverri v. Dole Food Company, Inc.</i>, 2013 WL 5977413 (Del. Super. Nov. 13, 2013), <i>Patrickson v. Dole Food Co., Inc.</i>, 330 P.3d 389 (Haw. App. 2014), <i>Chaverri v. Dole Food Company, Inc.</i>, 2012 WL 13202595 (E.D. La. May 10, 2012)</p>
Walmart, Inc.	Significant Co-Defendants in Talc-Related Litigation and Material Potentially Indemnified Parties	<p>M&G represents Walmart, Inc. in unrelated litigation in <i>Morris v. Walmart, Inc.</i>, No. 1:22-cv-06 (D. Mont.) and <i>Kress Stores of Puerto Rico, Inc., et al. v. Wal-Mart Puerto Rico, Inc., et al.</i>, No. 3:20-CV-01464 (D.P.R.), currently on appeal, No. 23-1060 (CA3). M&G previously represented Walmart, Inc. in <i>Lisowski v. Walmart Stores, Inc.</i>, No. 2:20-CV-01729-NR (W.D. Pa.), <i>aff'd</i>, No. 21-2501 (CA3).</p>
Walgreens	Significant Co-Defendants in Talc-Related Litigation and Material Potentially Indemnified Parties	<p>M&G paralegals worked on unrelated Walgreens matters at their previous employers. M&G represents a non-party subpoenaed in an unrelated matter where Walgreens is a party.</p>
Rio Tinto Energy America Inc.	Material Potentially Indemnified Parties	<p>M&G represents Union Pacific Railroad in unrelated antitrust litigation brought by Rio Tinto Energy America Inc.</p>
Valeant	Material Potentially Indemnified Parties	<p>An M&G associate represented on an unrelated matter, at her previous firm, Salix Pharmaceuticals, which Valeant acquired in 2015</p>
National Casualty Company	Debtor's Insurers	<p>An M&G associate at his prior firm represented a party that was adverse to National Casualty Company on an unrelated matter</p>
Travelers Casualty and Surety Company of America	Debtor's Insurers	<p>Prior to joining M&G, an attorney was involved in unrelated litigation against Travelers Casualty and Surety Company of America between 1993 and 2002</p>
Travelers Casualty	Debtor's Insurers	<p>Prior to joining M&G, an attorney was involved</p>

and Surety Company		in unrelated litigation against Travelers Casualty and Surety Company between 1993 and 2002
Liberty Mutual Insurance Company	Debtor's Insurers	Prior to joining M&G, an attorney was involved in unrelated litigation against Liberty Mutual Insurance Company between 1993 and 2002
Sentry Insurance A Mutual Company	Debtor's Insurers	Prior to joining M&G, an attorney was involved in unrelated litigation against Sentry Insurance A Mutual Company between 1993 and 2002
AlixPartners LLP	Debtor's Retained Professionals and Claims Agent	M&G represented affiliate of AlixPartners LLP as petitioner in unrelated litigation in Mar-Bow Value Properties v. McKinsey Recovery, U.S. No. 18-974, cert. denied 4/22/2019
Kirkland & Ellis LLP	Debtor's Retained Professionals and Claims Agent	An M&G partner worked on unrelated matters as a partner at Kirkland & Ellis. M&G paralegals worked on unrelated matters as a paralegal at Kirkland & Ellis.
Sidley Austin LLP	Debtor's Retained Professionals and Claims Agent	An M&G associate worked on unrelated matters as an associate at Sidley Austin.
Skadden, Arps, Slate, Meager & Flom LLP	Debtor's Ordinary Course Professionals	An M&G associate worked on unrelated matters as an associate at Skadden.
Blue Cross Blue Shield	Committee Member	M&G represents a non-party subpoenaed in an unrelated matter where a BCBS affiliate is a party.
Starr Indemnity & Liability Company	Debtor's Insurer	An M&G associate work on an unrelated matter during a judicial clerkship.
Great Northern Ins. Company	Debtor's Insurer	An M&G associate work on an unrelated matter during a judicial clerkship.